

VA Office of Inspector General

OFFICE OF AUDITS AND EVALUATIONS



National Cemetery Administration

*Audit of
Rural Veterans
Burial Initiative*

July 14, 2014
13-03468-203

ACRONYMS AND ABBREVIATIONS

FY	Fiscal Year
NCA	National Cemetery Administration
NVBG	National Veterans Burial Ground
OIG	Office of Inspector General
VA	Veterans Affairs
VetPop	Veteran Population Projection Model

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Report Highlights: Audit of NCA's Rural Veterans Burial Initiative

Why We Did This Audit

Public Law 113-6, Consolidated and Further Continuing Appropriations Act of 2013, required VA's National Cemetery Administration (NCA) to address Congressional concerns that NCA does not adequately serve the Nation's rural veterans. We evaluated whether NCA's Rural Veterans Burial Initiative (Rural Initiative) identifies the number and percentage of unserved veterans in rural areas.

What We Found

NCA's Rural Initiative does not adequately identify the number and percentage of veterans residing in rural areas who do not have reasonable access to a burial option. We determined that prior to the planned Rural Initiative National Veterans Burial Grounds, NCA was not providing reasonable access to a burial option for approximately 302,000 (34 percent) of about 888,000 rural veterans in the initiative's 8 targeted states. When completed, NCA's Rural Initiative is expected to decrease the total number of unserved rural veterans by nearly 120,000 (40 percent) to about 182,000 in these 8 states.

NCA could not adequately identify the number and percentage of unserved veterans who reside in rural areas because it uses a methodology that identifies veterans residing within a 75-mile radius of a National, VA-funded State or tribal organization veterans' cemetery and does not classify veterans as rural, urban, or any other designation. In addition, NCA lacked a specific performance measurement that

evaluated NCA's progress towards increasing service to rural veterans.

As a result, NCA cannot evaluate the level of service provided to veterans and their families residing in rural areas throughout the eight targeted states and the entire Nation. Without this veteran population information, NCA cannot adequately report to Congress, and other stakeholders, its performance on serving rural veterans.

What We Recommended

We recommended the Under Secretary for Memorial Affairs establish a methodology to identify the number and percentage of served and unserved rural veterans, publish a national map showing the areas and number of served and unserved rural veterans, and establish performance goals for the percentage of rural and urban veterans served.

Agency Comments

The Under Secretary concurred with the recommendations and submitted acceptable corrective action plans. We will follow up on implementation of the corrective actions.

A handwritten signature in black ink, reading "Linda A. Halliday".

LINDA A. HALLIDAY
Assistant Inspector General
for Audits and Evaluations

TABLE OF CONTENTS

Introduction.....		1
Results and Recommendations		2
Finding	NCA’s Rural Initiative Needs to Identify the Number and Percentage of Rural Veterans Needing Burial Options	2
	Recommendations	7
Appendix A	Background	8
Appendix B	Scope and Methodology	9
Appendix C	Geographical Analyses of Rural Veterans Served and Unserved	10
Appendix D	Under Secretary for Memorial Affairs Comments.....	17
Appendix E	Office of Inspector General Contact and Staff Acknowledgments	23
Appendix F	Report Distribution.....	24

INTRODUCTION

Objective

We conducted this audit to evaluate whether the National Cemetery Administration's (NCA) Rural Veterans Burial Initiative (Rural Initiative) identifies the number and percentage of unserved veterans in rural areas.

Rural Veterans Burial Initiative

In September 2011, NCA established the Rural Initiative to improve burial access for veterans residing in rural areas. The Rural Initiative targeted states that lack a National cemetery with available space for initial burials. In the targeted states, the Rural Initiative focused on areas unserved by State or tribal organization veterans' cemeteries funded by the VA or National cemeteries in a bordering state. The Rural Initiative is expected to establish a National cemetery presence in rural areas of 8 states where the veteran population is less than 25,000 within a 75-mile radius of proposed National Veterans Burial Ground (NVBG) locations. Table 1 shows the planned NVBG locations.

Table 1. Planned Locations for National Veterans Burial Grounds

1. Twin Falls, ID	5. Fargo, ND
2. Calais, ME	6. Cedar City, UT
3. Laurel, MT	7. Rhinelander, WI
4. Elko, NV	8. Cheyenne, WY

Source: NCA's Rural Initiative

Public Law 113-6

Public Law 113-6, Consolidated and Further Continuing Appropriations Act, dated March 26, 2013, required NCA to address Congressional concerns that the Nation's rural veterans are not adequately served. For example, concerns included identifying the number of and geographic areas where rural veterans are unserved, assessing gaps in service between rural and urban veterans, recommending appropriate policy on new National cemeteries to serve rural areas, and developing a national map showing number and areas of unserved veterans. This Act also required the VA Secretary to provide a strategy with proposed policies and an implementation time frame to address concerns within 180 days of when Congress enacted the law. In addition, the Act required the Government Accountability Office to certify that NCA's strategy addresses Congressional concerns.

Other Information

- Appendix A provides pertinent background information.
- Appendix B provides details on our scope and methodology.
- Appendix C shows state maps analyzing rural veterans.

RESULTS AND RECOMMENDATIONS

Finding **NCA's Rural Initiative Needs to Identify the Number and Percentage of Rural Veterans Needing Burial Options**

NCA's Rural Initiative does not adequately identify the number and percentage of veterans residing in rural areas who do not have reasonable access to a burial option. We determined that prior to the planned Rural Initiative NVBGs, NCA was not providing reasonable access to a burial option for approximately 302,000 (34 percent) of about 888,000 rural veterans in the initiative's 8 targeted states. When completed, NCA's Rural Initiative is expected to decrease the total number of unserved rural veterans by nearly 120,000 (40 percent) to about 182,000 in these 8 states.

NCA could not adequately identify the number and percentage of unserved veterans who reside in rural areas because it uses a methodology that identifies veterans residing within a 75-mile radius of a National, VA-funded State or tribal organization veterans' cemetery and does not classify veterans as rural, urban, or any other designation. In addition, NCA lacked a specific performance measurement that evaluated NCA's progress towards increasing service to rural veterans. As a result, NCA cannot evaluate the level of service provided to veterans and their families residing in rural areas throughout the eight targeted states and the entire Nation. Without this specific veteran population information, NCA cannot adequately report to Congress, and other stakeholders, its performance on serving rural veterans.

Unserved Veterans Not Identified

In Public Law 113-6, Congress expressed concerns that NCA was not adequately serving rural veterans. The public law required NCA to address several Congressional concerns about rural veterans, such as identifying the number of, and geographic areas where rural veterans are unserved.

Our analysis of fiscal year (FY) 2013 Veteran Population Projection Model (VetPop) data determined that before completion of the planned NVBGs, NCA did not provide reasonable access to a burial option for about 34 percent of rural veterans in the eight states. Appendix A provides additional information about VetPop. The unserved rural veteran population ranged from about 9,400 in Maine to about 62,100 in Wisconsin. The establishment of NVBGs is expected to decrease the total number of rural veterans in these 8 states who do not have reasonable access to a burial option from approximately 302,000 to about 182,000. However, for these remaining unserved veterans outside the planned NVBG service areas, NCA could not adequately identify the number and percentage of these rural veterans.

Our analysis found that once NCA completes the NVBGs, the number of unserved rural veterans in the 8 states is expected to range from zero in

Maine to about 43,600 in Wisconsin. In addition, the percentage of unserved rural veterans is expected to decline to about 20 percent. Table 2 provides our analysis of rural veterans unserved before and after completion of NCA's Rural Initiative.

Table 2. Rural Veterans in NCA's Eight Targeted States

State	Rural Veterans	Veterans Unserved Before Initiative	Veterans Served By Initiative	Veterans Unserved After Initiative
Idaho	103,881	48,485 (47%)	13,547 (28%)	34,938 (34%)
Maine	127,694	9,441 (7%)	9,441 (100%)	0 (0%)
Montana	101,594	50,382 (50%)	17,967 (36%)	32,415 (32%)
Nevada	38,369	9,505 (25%)	4,934 (52%)	4,571 (12%)
North Dakota	56,211	43,502 (77%)	20,471 (47%)	23,031 (41%)
Utah	100,639	31,396 (31%)	15,491 (49%)	15,905 (16%)
Wisconsin	302,674	62,062 (21%)	18,459 (30%)	43,603 (14%)
Wyoming	56,517	47,119 (83%)	19,864 (42%)	27,255 (48%)
Total	888,000	302,000 (34%)	120,000 (40%)	182,000 (20%)

Source: VA OIG analysis of FY 2013 VetPop data

Note: Totals rounded for report presentation.

*Post-Initiative -
Significant
Number of
Rural Veterans
Remain
Unserved*

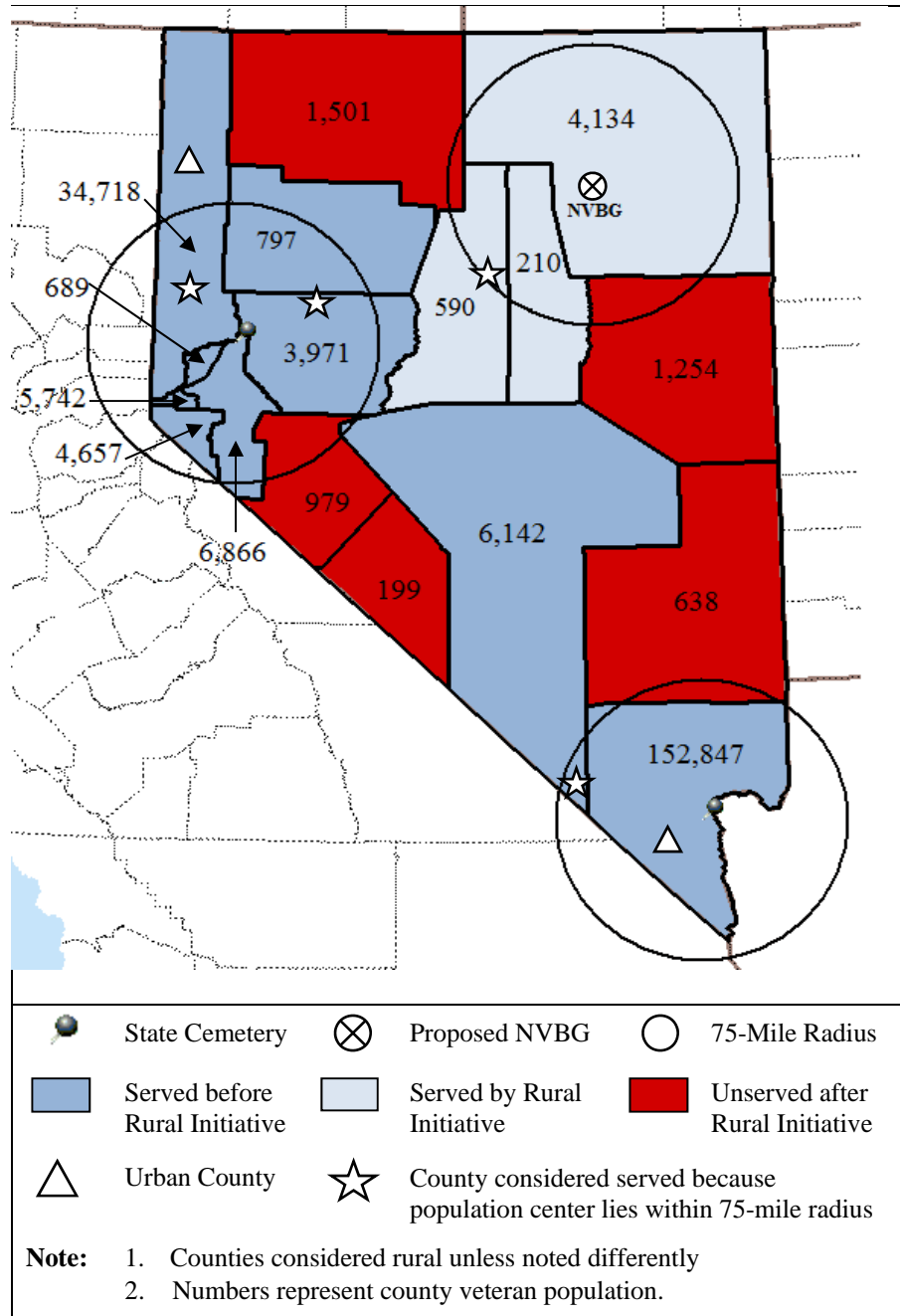
We used NCA's 75 mile radius methodology for identifying served rural veterans in the eight targeted states. To identify the unserved rural veterans, we used NCA's veteran population threshold of less than 25,000 to classify counties as rural, and considered populations of 25,000 and over as urban. We then totaled the number of veterans residing in rural counties and identified the total and percentage of unserved rural veterans for each of the eight states.

Our analysis identified approximately 302,000 unserved rural veterans before the establishment of NVBGs. After the completion of the NVBGs, we determined about 182,000 rural veterans would remain unserved. However, NCA's methodology did not allow NCA to identify about 182,000 veterans who would remain unserved in rural areas after completing the Rural Initiative. NCA officials agreed our methodology was one possible approach for identifying the number and percentage of unserved veterans residing in rural areas. For each of the targeted states, we developed maps to analyze the number of veterans in served and unserved counties before and after NCA's Rural Initiative.

Nevada

We determined of the approximately 38,400 rural veterans residing in Nevada, about 9,500 in 8 counties were considered unserved before the planned NVBG. Figure 1 shows the map for Nevada.

Figure 1. OIG Analysis of NCA Service Before and After Rural Initiative—Nevada



Source: VA OIG analysis of FY 2013 VetPop data

We also determined the Rural Initiative is expected to increase burial access for about 4,900 unserved rural veterans in Nevada after the completion of the

**Reasons for
Not Identifying
Unserved
Veterans**

NVBG in Elko, NV. In addition, with the completion of the NVBG, Nevada is expected to have 5 counties with almost 4,600 rural veterans remaining unserved. Appendix C provides maps of the remaining seven targeted states.

Although the completion of NVBGs in these rural locations should decrease the unserved veteran population, NCA could not adequately identify the number and percentage of veterans who would remain unserved in rural areas upon completion of its Rural Initiative. NCA used a methodology that was limited to identifying rural veterans served by a burial option within a reasonable distance of their residence. NCA considered service areas as being rural if less than 25,000 veterans resided within a 75-mile radius of NVBGs.

Using NCA's methodology, to identify the total rural veteran populations within the 8 states for potential NVBG locations, we determined NCA would need to perform the following steps in each of the just over 2,200 towns or cities in 175 counties:

- Identify counties 50 percent or more within a 75-mile radius of the town or city.
- Identify counties less than 50 percent within the 75-mile radius and determine if the population center lies within the radius.
- Identify counties intersected by more than one 75-mile radius and determine if the area covered exceeds 50 percent or more of the county.
- Total the veteran populations for the counties and determine if the total is less than 25,000.

While performing these steps, NCA would need to ensure county veteran populations are counted only once in overlapping 75-mile radius areas. For example, our analysis of Montana shows NCA would need to plot a 75-mile radius around approximately 280 towns or cities while identifying overlapping areas and ensuring veteran populations are counted only once. NCA acknowledged this when it reported to Congress that there are an unlimited number of potential service areas that could be analyzed as being rural by simply moving the focal point of the 75-mile radius from one potential town or city to another.

Table 3 shows our analysis of the number of towns or cities in unserved counties of the eight targeted states before the Rural Initiative.

Table 3. Geographic Areas Lacking Burial Options in NCA's Targeted States Before the Rural Initiative

State	Unserved Counties	Unserved Towns/Cities
Idaho	30	368
Maine	2	116
Montana	33	276
Nevada	8	116
North Dakota	40	521
Utah	19	274
Wisconsin	24	327
Wyoming	19	226
Total	175	2,200

Source: VA OIG analysis of 2013 VetPop and the National Association of Counties data

Note: Unserved towns/cities total rounded for report presentation.

*Lack of
Performance
Measurement*

NCA lacks a specific performance measurement for serving rural veterans. Although NCA's strategic goal of providing a burial option to 96 percent of the Nation's veterans measures the overall progress of providing burial services to all veterans, the goal is not quantifiable or measurable to evaluate the level of service provided to rural veterans. VA's strategic plan requires the establishment of goals that measure the level of performance to be achieved. Also, the Government Performance and Results Modernization Act of 2010, requires Federal agencies to establish performance goals expressed in an objective, quantifiable, and measurable form. In addition, the Act requires a performance indicator be established to assess the progress of the goal.

NCA can report progress toward its strategic target of providing reasonable access to a burial option for 96 percent of the Nation's veterans. However, NCA's lack of identifying the veteran population as "rural" or "urban" prevents NCA from being able to adequately report progress towards addressing Congressional concerns about NCA's service to rural veterans. Without having a specific quantifiable and measurable goal for providing services to rural veterans, NCA cannot adequately identify and report its progress of providing rural veterans reasonable access to a burial option.

As a result, NCA cannot evaluate the level of service provided to veterans and their families residing in rural areas throughout the eight targeted states

and the entire Nation. Without this specific veteran population information, NCA cannot adequately report to Congress and other stakeholders its performance on serving rural veterans.

Conclusion

NCA needs to establish a methodology that identifies the number and percentages of rural veterans unserved to adequately report to Congress, and other stakeholders, its performance on serving rural veterans. Having the ability to report the population of veterans residing in specific geographic areas of the country will provide NCA sufficient information to evaluate service and take appropriate actions to achieve its performance goals.

Recommendations

1. We recommended the Under Secretary for Memorial Affairs establish a methodology to identify the number and percentage of served and unserved rural veterans throughout the Nation.
2. We recommended the Under Secretary for Memorial Affairs publish a national map showing the areas and number of served and unserved rural veterans.
3. We recommended the Under Secretary for Memorial Affairs establish performance goals for the percentage of rural and urban veterans served.

Management Comments

The Under Secretary for Memorial Affairs concurred with our recommendations. NCA will develop a methodology to identify veterans living in rural areas and establish a database that will enable analysis of veteran demographics at the State, regional, and national levels. The Under Secretary stated that with this data, NCA will be able to identify and quantify the number and percentage of served and unserved rural veterans throughout the Nation. NCA will also have the capability to produce a national map showing the areas and number of served and unserved rural veterans. NCA plans to complete these actions by the end of the first quarter of FY 2015.

The Under Secretary reported NCA's rural area methodology and database will enable analysis of service to veterans that will make possible the development of performance measures that address rural and urban veterans. The specific performance measures for these subgroups will be defined within the previously established overall burial access goal of 96 percent. The Under Secretary also provided comments explaining NCA's viewpoint on aspects of the OIG's finding. NCA plans to complete these actions by the end of the second quarter of FY 2015.

OIG Response

NCA's planned corrective actions are acceptable. We will monitor NCA's progress and follow up on the implementation of our recommendations until all proposed actions are completed. Appendix D provides the full text of the Under Secretary for Memorial Affairs' comments.

Appendix A Background

Role of NCA

NCA's primary goal is to ensure that the burial needs of veterans and their eligible family members are met by establishing, operating, and maintaining VA National cemeteries and providing grants for establishing, expanding, or improving State and tribal veterans cemeteries. In FY 2013, NCA reported maintaining approximately 3.2 million gravesites at 131 National cemeteries in 39 states and Puerto Rico, as well as in 33 soldiers' lots and monument sites. NCA also reported conducting 124,800 interments and processing 358,600 applications for headstones and markers for placement in cemeteries. In addition, NCA reported serving nearly 90 percent of the U.S. veteran population with a burial option within 75 miles of their residences.

Rural Veterans Burial Initiative

In 2011, NCA established the Rural Initiative, targeting eight states that lack a National cemetery with available space for first interment. In the targeted states, the Rural Initiative focused on areas unserved by State or tribal organization veterans' cemeteries funded by the VA or National cemeteries in a bordering state. In addition, NCA determined these states had unserved veteran populations of less than 25,000 within a 75-mile radius of proposed NVBG locations.

NCA used the less than 25,000-person population threshold to define a rural area because its analysis determined this threshold would identify locations that provide service to areas with the greatest number of unserved veterans. In addition, NCA reported its 75-mile radius service area standard is based on a review of national cemetery data indicating over 80 percent of people interred in National cemeteries resided within 75 miles of the cemetery at time of death.

Where possible, NCA plans to establish NVBGs in public or privately owned cemeteries. The NVBGs will have the same eligibility requirements, maintenance standards, and appearance as VA National cemeteries. In FY 2014, NCA plans to begin constructing NVGBs and expects the eight proposed sites to be open for interments by the end of FY 2017.

VetPop Model

VetPop is an actuarial model for veteran population projections developed by VA's Office of the Actuary. VetPop uses both veteran and survey data from sources including VA, the Department of Defense, the Social Security Administration, the Internal Revenue Service, and the Census Bureau's American Community Survey. Using these sources, VetPop provides veteran counts by demographic characteristics, such as age, gender, period of service, and race at various geographic levels.

Appendix B Scope and Methodology

Scope

We conducted our audit from November 2013 through May 2014. We evaluated whether NCA's Rural Initiative identified the number and percentage of unserved veterans in rural areas. Our scope focused on rural veteran populations in eight states targeted by NCA's Rural Initiative. We used VA's VetPop actuarial model for veteran population projections based on FY 2013 state and county-level demographic characteristics.

To obtain an understanding of NCA's Rural Initiative and methodology for identifying served veterans, we interviewed officials from NCA's Office of Finance and Planning. We also interviewed VA's Congressional liaison and officials from the Veterans Health Administration's Office of Rural Health. The audit included a site visit at the VA central office in Washington, DC, to meet with NCA officials.

Methodology

To accomplish our objective, we reviewed Public Laws, House of Representative reports, NCA's Rural Veterans Burial Access Strategy, the Rural Veterans Burial Initiative, and procedures. For the eight states targeted by the Rural Initiative, we developed maps showing the rural veterans served before, served by, and unserved after NCA's Rural Initiative. Each map analyzed FY 2013 county veteran population data gathered from VetPop, and the locations of existing state cemeteries and planned NVBGs. We classified counties as rural if the veteran population was less than 25,000, and urban if 25,000 and over. See Figure 1 and Appendix C for maps analyzing rural veterans served and unserved in the eight states.

Data Reliability

We used computer-processed FY 2013 VetPop data from VA's Office of the Actuary to determine State and county veteran populations. Additionally, we verified the State and county veteran populations for accuracy and completeness. We compared VetPop and Census Bureau State veteran population data to ensure totals were reasonable. VA's Office of the Actuary certified the validity and reliability of VetPop data. We concluded the data from VetPop were appropriate and sufficiently reliable to accomplish the audit objective.

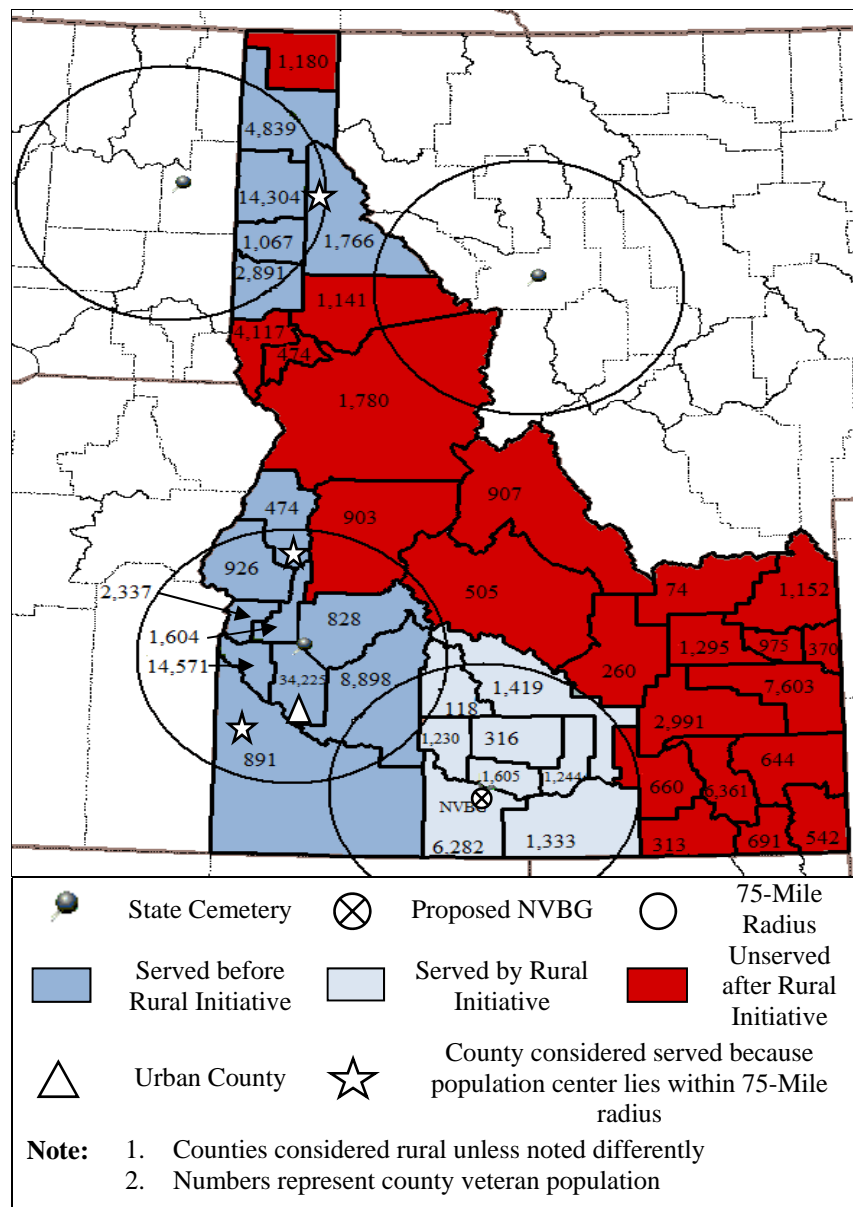
Government Standards

Our assessment of internal controls focused on those controls relating to our audit objective. We conducted our audit in accordance with generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our finding and conclusion based on our audit objective.

Appendix C Geographical Analyses of Rural Veterans Served and Unserved

Of the approximate 104,000 rural veterans residing in Idaho, we determined about 48,500 in 30 counties were considered unserved before the initiative. We also determined NCA is expected to increase burial access for just over 13,500 unserved Idaho rural veterans after the completion of the NVBG in Twin Falls, ID. In addition, with the completion of the NVBG, Idaho is expected to have 22 counties just under 35,000 rural veterans remaining unserved.

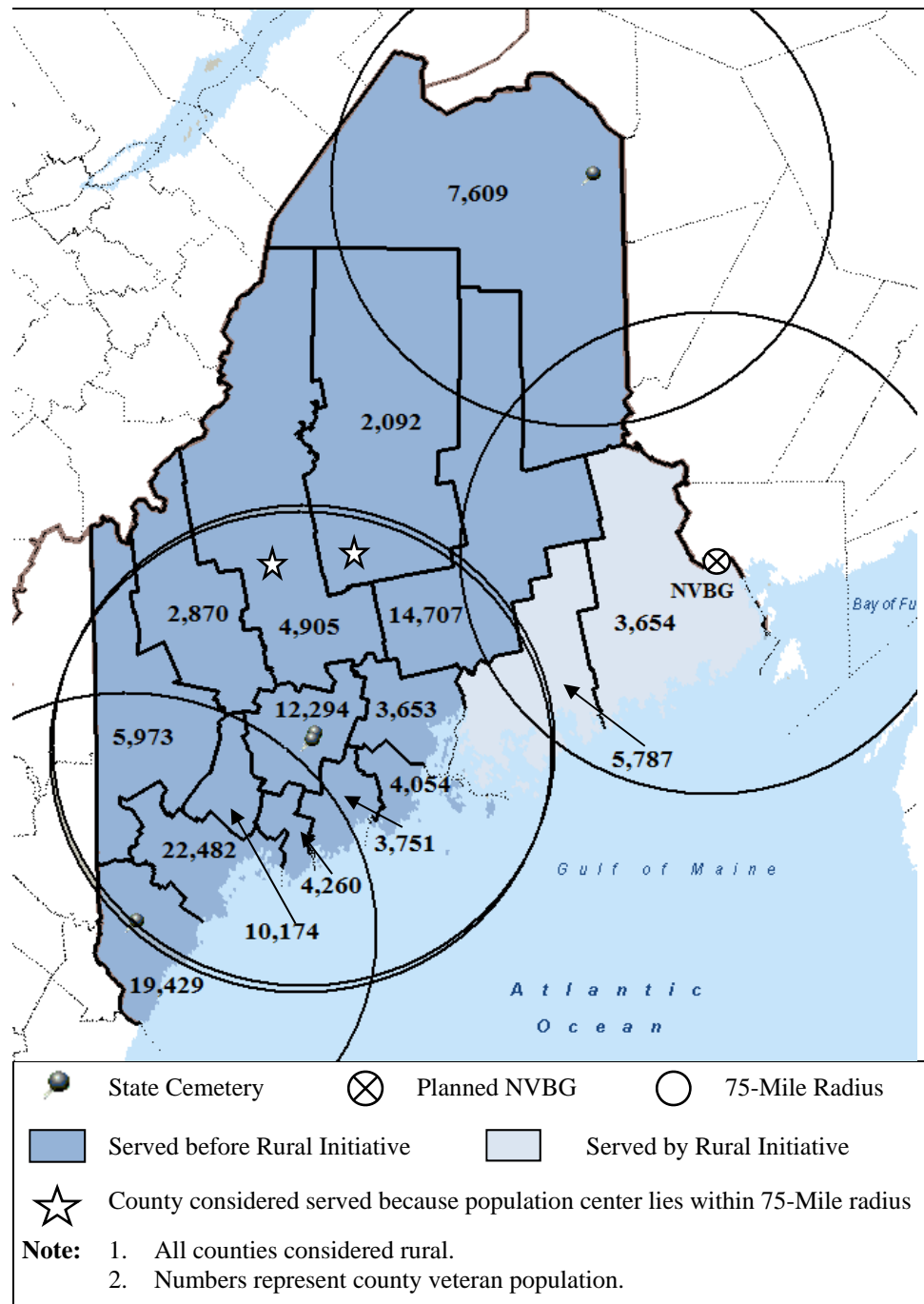
Figure 2. OIG Analysis of NCA Service Before and After Rural Initiative—Idaho



Source: VA OIG analysis of FY 2013 VetPop data

Of the approximate 128,000 rural veterans residing in Maine, we determined about 9,400 in two counties were considered unserved before the initiative. We also determined NCA is expected to increase reasonable burial access for all of these about 9,400 unserved rural veterans after completion of the NVBG in Calais, ME.

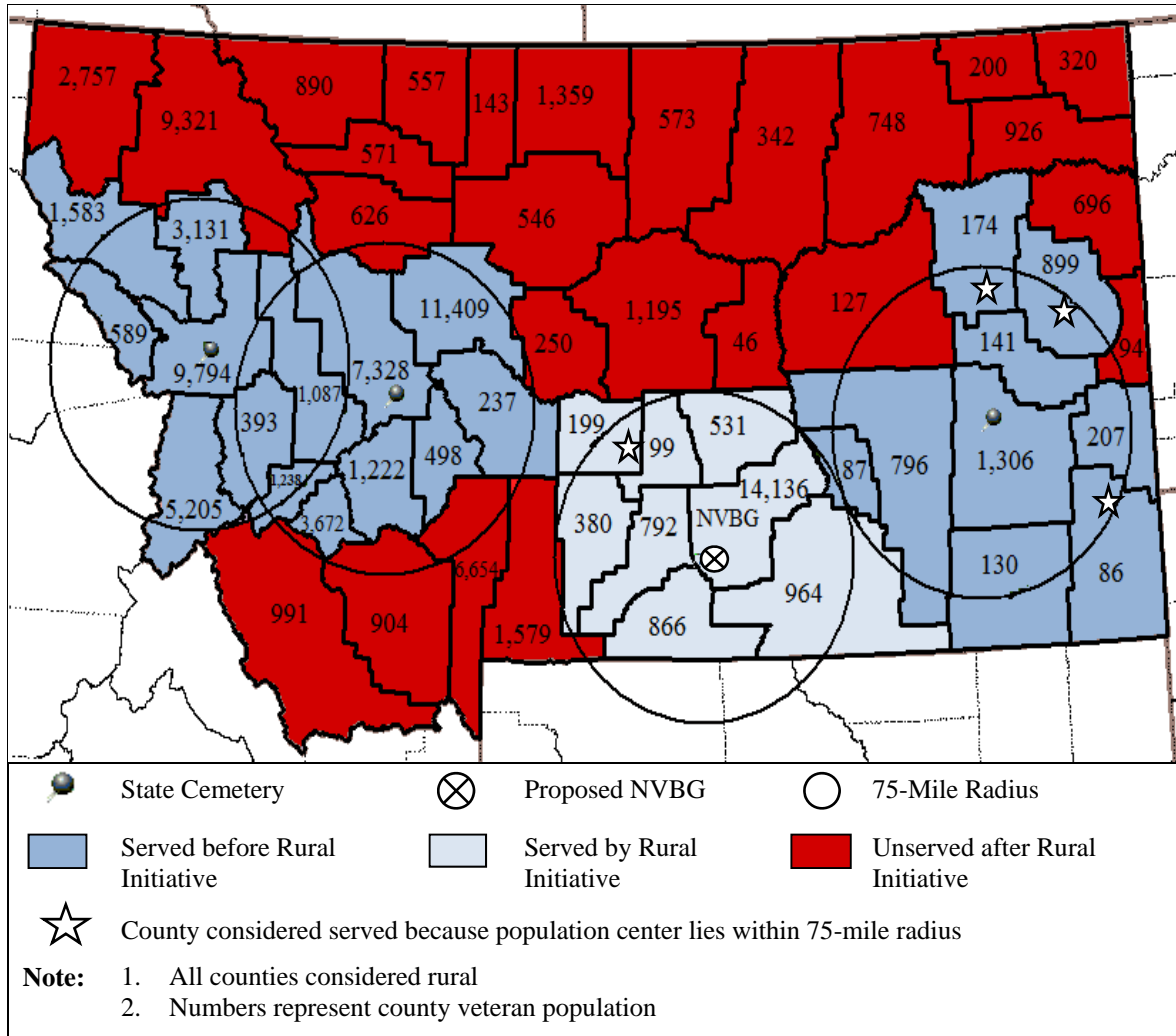
Figure 3. OIG Analysis of NCA Service Before and After Rural Initiative—Maine



Source: VA OIG analysis of FY 2013 VetPop data

Of the approximate 102,000 rural veterans residing in Montana, we determined about 50,400 in 33 counties were considered unserved before the initiative. We also determined NCA is expected to increase burial access for close to 18,000 unserved rural veterans in Montana after the completion of the NVBG in Laurel, MT. In addition, with the completion of the NVBG, Montana is expected to have 25 counties with nearly 32,400 rural veterans remaining unserved.

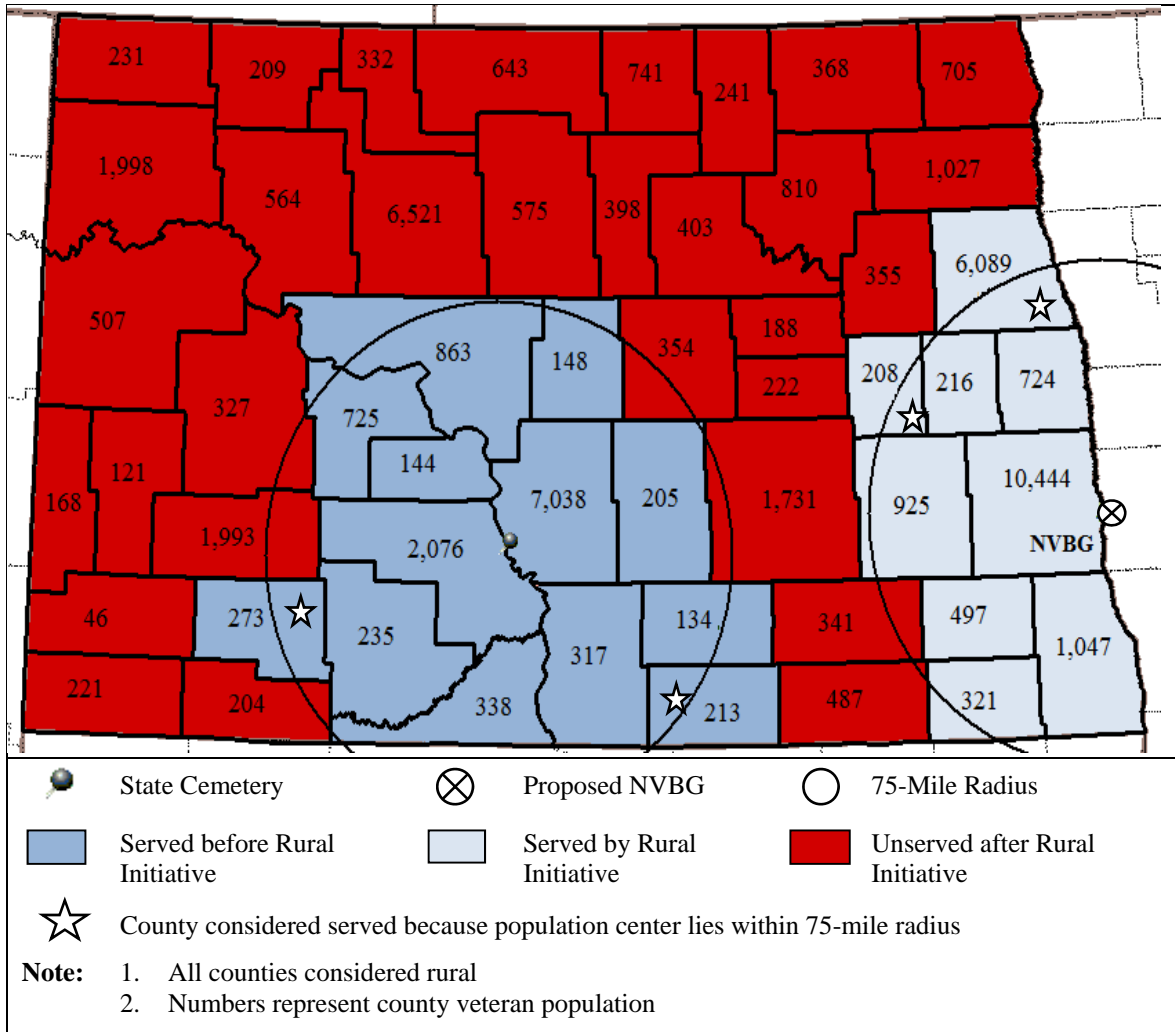
Figure 4. OIG Analysis of NCA Service Before and After Rural Initiative—Montana



Source: VA OIG analysis of FY 2013 VetPop data

Of the approximate 56,200 rural veterans residing in North Dakota, we determined about 43,500 in 40 counties were considered unserved before the initiative. We also determined NCA is expected to increase burial access for about 20,500 unserved rural veterans in North Dakota after the completion of the NVBG in Fargo, ND. In addition, with the completion of the NVBG, North Dakota is expected to have 31 counties with just over 23,000 rural veterans remaining unserved.

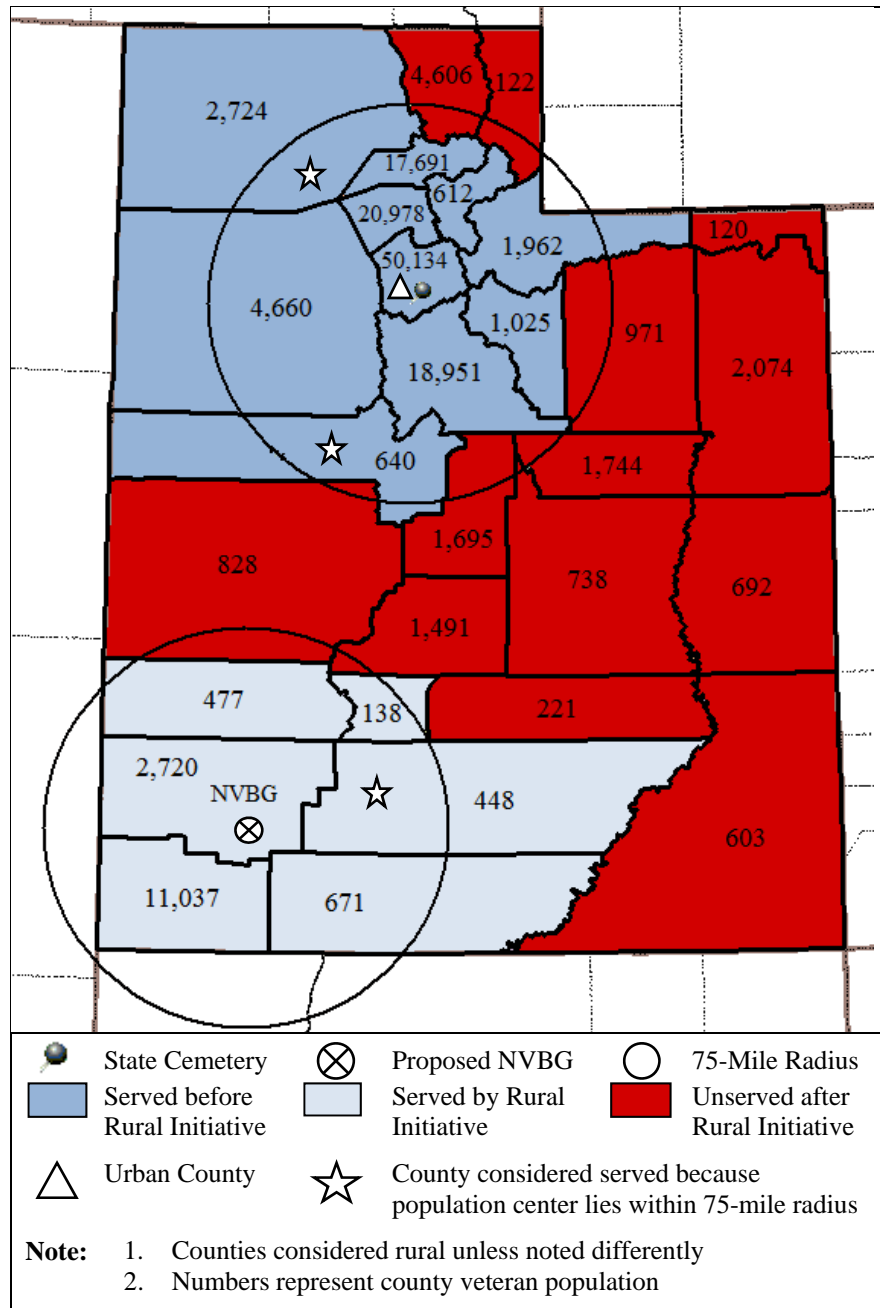
Figure 5. OIG Analysis of NCA Service Before and After Rural Initiative—North Dakota



Source: VA OIG analysis of FY 2013 VetPop data

Of the approximate 101,000 rural veterans residing in Utah, we determined about 31,400 in 19 counties were considered unserved before the initiative. We also determined NCA is expected to increase burial access for nearly 15,500 unserved rural veterans in Utah after the completion of the NVBG in Cedar City, UT. In addition, with the completion of the NVBG, Utah is expected to have 13 counties with about 15,900 rural veterans remaining unserved.

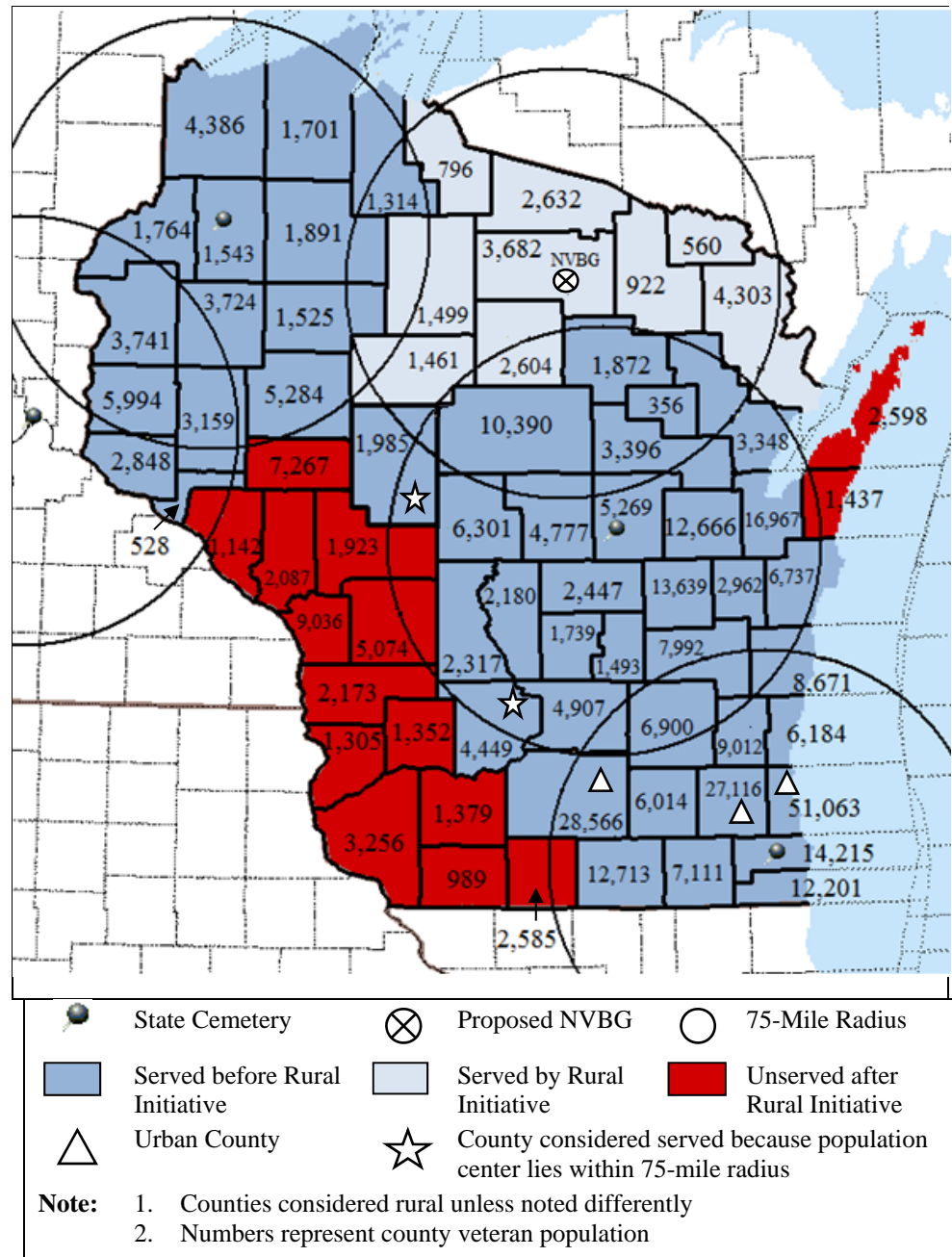
Figure 6: OIG Analysis of NCA Service Before and After Rural Initiative—Utah



Source: VA OIG analysis of FY 2013 VetPop data

Of the approximate 303,000 rural veterans residing in Wisconsin, we determined about 62,100 in 24 counties were considered unserved before the initiative. We also determined NCA is expected to increase burial access for just under 18,500 unserved rural veterans in Wisconsin after completing the NVBG in Rhinelander, WI. In addition, with the completion of the NVBG, Wisconsin is expected to have 15 counties with about 43,600 rural veterans remaining unserved.

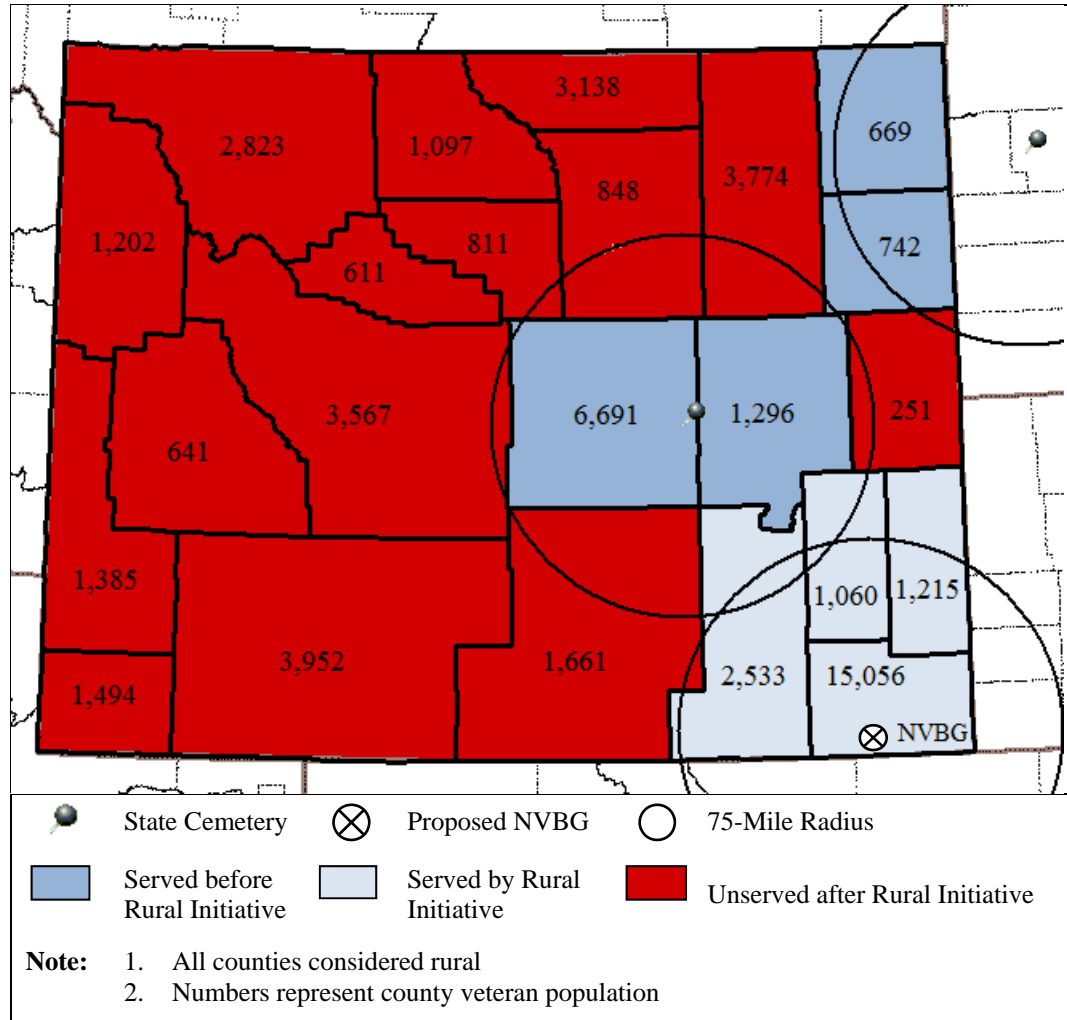
Figure 7. OIG Analysis of NCA Service Before and After Rural Initiative—Wisconsin



Source: VA OIG analysis of FY 2013 VetPop data

Of the approximate 56,500 rural veterans residing in Wyoming, we determined close to 47,100 in 19 counties were considered unserved before the initiative. We also determined NCA is expected to increase burial access for about 19,900 unserved rural veterans in Wyoming after the completion of the NVBG in Cheyenne, WY. In addition, with the completion of the NVBG, Wyoming is expected to have 15 counties with just over 27,200 rural veterans remaining unserved.

Figure 8: OIG Analysis of NCA Service Before and After Rural Initiative—Wyoming



Source: VA OIG analysis of FY 2013 VetPop data

Appendix D Under Secretary for Memorial Affairs Comments

Department of Veterans Affairs

Memorandum

Date: June 18, 2014

From: Under Secretary for Memorial Affairs (40)

Subj: NCA Comments – Draft Report, Audit of Service to Rural Veterans Project
Number 2013-03468-R3-0176

To: Assistant Inspector General for Audits and Evaluations (52)

Attached are the National Cemetery Administration's comments on findings and concurrence with recommendations in the Office of Inspector General report, "Audit of Service to Rural Veterans," dated May 16, 2014. Our point of contact is Mr. Ronald E. Walters, Acting Principal Deputy Under Secretary for Memorial Affairs. Mr. Walters may be contacted by phone at (202) 461-6738 or by email at ronald.walters@va.gov.



Steve L. Muro

Attachment

cc: Director, Atlanta Audit and Evaluation Operations Division (52AT)

Attachment

**Audit of NCA's Rural Veterans Burial Initiative
Project Number 2013-03468-R3-0176, Issued May 16, 2014**

Recommendation 1:	We recommended the Under Secretary for Memorial Affairs establish a methodology to identify the number and percentage of served and unserved rural veterans throughout the Nation.
OIG Comment:	Please indicate your concurrence or non-concurrence with the recommendation below.
VA Response:	<p>NCA concurs with this recommendation.</p> <p>NCA will develop a methodology to identify veterans living in rural areas. This will enable NCA to more easily identify rural veterans on a national level.</p> <p>NCA currently is in the process of establishing a new database that will enable analysis of veteran demographics at the state, regional and national levels. The database will identify each county in the country as either being served or unserved by a VA national or VA-funded state veterans cemetery and the specific cemeteries that provide service to each served county. The database will also include county-level veteran population estimates from VA's VetPop2011 model. Paired with NCA's new rural area definition, this database will enable NCA to quickly and comprehensively identify served and unserved veterans by county at the state, regional, and national levels. Through this capability, NCA will be able to identify and quantify the number and percentage of served and unserved rural veterans throughout the Nation.</p> <p>NCA plans to complete the validation and activation of the database by the end of the first quarter of Fiscal Year 2015.</p>
Recommendation 2:	We recommended the Under Secretary for Memorial Affairs publish a national map showing the areas and number of served and unserved rural veterans.
OIG Comment:	Please indicate your concurrence or non-concurrence with the recommendation below.
VA Response:	<p>NCA concurs with this recommendation.</p> <p>The database described in Recommendation 1 will include veteran population estimates at the county level from VA's VetPop2011 model and will tie into NCA's mapping software. Once completed, NCA will have the capability to produce a national map showing the areas and number of served and unserved rural veterans in accordance with its newly developed rural area methodology.</p> <p>NCA plans to complete the validation and activation of the database by the end of the first quarter of Fiscal Year 2015.</p>
Recommendation 3:	We recommended the Under Secretary for Memorial Affairs establish performance goals for the percentage of rural and urban veterans served.

OIG Comment:	Please indicate your concurrence or non-concurrence with the recommendation below.
VA Response:	<p>NCA concurs in part with this recommendation.</p> <p>NCA's rural area methodology and database will enable analysis of service to veterans that will make possible the development of performance measures that address rural and urban veterans. The specific performance measures for these subgroups will be defined within the previously established overall burial access goal of 96 percent by the end of the second quarter of Fiscal Year 2015.</p>
Draft Report Finding:	NCA's Rural Initiative Needs To Identify the Number and Percentage of Rural Veterans Needing Burial Options
Finding: (Page 2, Paragraph 1)	"We determined that prior to the planned Rural Initiative NVBGs, NCA was not providing reasonable access to a burial option for approximately 302,000 (34 percent) of about 888,000 rural veterans in the initiative's 8 targeted states. When completed, NCA's Rural Initiative is expected to decrease the total number of unserved rural veterans by nearly 120,000 (40 percent) to about 182,000 in these 8 states."
VA Comments:	<p>This analysis is based on OIG's definition of a rural area and estimate of the number of veterans that will be served by the eight Rural Initiative sites. Using its current service area methodology, NCA estimates that more than 133,000 veterans will be served by the eight sites.</p> <p>OIG's analysis is limited to only the eight states that are part of the Rural Initiative, which have low population totals and less cemetery coverage. Historically, NCA has pursued a strategy of locating national cemeteries in areas of the country with the greatest need. However, these cemeteries serve not only major metropolitan areas, but rural veterans in the surrounding areas that lie within each cemetery's 75-mile service area. Accordingly, NCA believes that many rural veterans are served by existing national and VA-funded state cemeteries, particularly in areas such as the Northeastern United States and Florida, where current cemetery coverage is at or near 100% of the state's population.</p>
Finding: (Page 2, Paragraph 2)	"NCA lacked a specific performance measurement that evaluated NCA's progress towards increasing service to rural veterans. As a result, NCA cannot evaluate the level of service provided to veterans and their families residing in rural areas throughout the eight targeted states and the entire Nation. Without this specific veteran population information, NCA cannot adequately report to Congress and other stakeholders its performance on serving rural veterans."
VA Comments:	NCA agrees that it is currently unable to calculate a percentage of rural veterans served; however, NCA is able to evaluate the level of service provided to veterans and their families residing in rural areas in the eight targeted states. Beginning with VA's FY 2013 Budget, NCA has reported to Congress that, using the methodology of identifying areas with less than 25,000 veterans within a 75-mile service area standard, more than 133,000 veterans will be served by the eight sites of the Rural Initiative.

Finding: (Page 2, Paragraph 4)	"The establishment of NVBGs is expected to decrease the total number of rural veterans in these 8 states who do not have reasonable access to a burial option from approximately 302,000 to about 182,000."
VA Comments:	This estimate is based on OIG's definition of a rural area as one in which fewer than 25,000 veterans reside within a county. This methodology differs from NCA's Rural Initiative threshold of fewer than 25,000 veterans within a 75-mile service area. As a result, OIG's estimate of the number of veterans that will be served by the eight Rural Initiative sites is different from NCA's calculation.
Finding: (Page 3, Paragraph 1)	"Our analysis found that once NCA completes the NVBGs, the number of unserved rural veterans in the 8 states is expected to range from 0 in Maine to about 43,600 in Wisconsin."
VA Comments:	Wisconsin illustrates one major difference in the county-level approach to identifying rural veterans as opposed to NCA's service area approach. The LaCrosse, Wisconsin area was initially considered as a possible location for a Rural Initiative site in part because no individual county in the surrounding area has more than 10,000 veterans. However, the several counties in Wisconsin, Minnesota, and Iowa that would fall within the 75-mile service area of a potential cemetery in LaCrosse combined were found to have in excess of 50,000 veterans. While this area would be considered as rural based on a county-level definition, taking into account all of the veterans living within 75 miles of LaCrosse, NCA determined that the LaCrosse, Wisconsin area was not best suited for a rural cemetery and that the veterans residing in this area could be better served by a future state veterans cemetery in Wisconsin.
Finding: (Page 3, Paragraph 2)	"We used NCA's 75 mile radius methodology for identifying served rural veterans in the eight targeted states. To identify the unserved rural veterans, we used NCA's veteran population threshold of less than 25,000 to classify counties as rural and considered populations of 25,000 and over as urban."
VA Comments:	NCA wishes to clarify that OIG's applications of NCA's rural veteran population threshold of less than 25,000 veterans living within a 75-mile service area is different from NCA's methodology, which identifies veterans within a 75-mile service area rather than at the county level.
Finding: (Page 3, Paragraph 3)	"After the completion of the NVBGs, we determined about 182,000 rural veterans would remain unserved. However, NCA's methodology did not allow NCA to identify the remaining about 182,000 veterans who would remain unserved in rural areas after completing the Rural Initiative."
VA Comments:	NCA's service area methodology can be applied on a state-by-state basis to identify veterans in rural areas who will remain unserved after completing the Rural Initiative. For example, in Nevada, the remaining counties that are considered to be unserved after the completion of the Rural Initiative site in Elko have a combined veteran population of less than 12,000. This figure is below NCA's 25,000 threshold; therefore, NCA would consider all remaining unserved veterans in Nevada to be in rural areas.

Finding: (Page 3, Paragraph 3)	"NCA officials agreed with our methodology for identifying the number and percentage of unserved veterans residing in rural areas."
VA Comments:	NCA understood OIG's methodology for identifying the number and percentage of unserved veterans residing in rural areas and agreed that it was one possible methodology for identifying the number and percentage of unserved veterans residing in rural areas.
Finding: (Page 5, Paragraph 4)	"For example, our analysis of Montana shows NCA would need to plot a 75-mile radius around approximately 280 towns or cities while identifying overlapping areas and ensuring veteran populations are counted only once. NCA acknowledged this when it reported to Congress that there are an unlimited number of potential service areas that could be analyzed as being rural by simply moving the focal point of the 75-mile radius from one potential town or city to another."
VA Comments:	NCA reported to Congress under PL 113-6 that "there are an unlimited number of potential service areas that could be analyzed as being rural that could be constructed simply by moving the focal point of a circle with a 75-mile radius from one town to another." This statement was made in response to Congress' request that VA provide "data identifying the number of and geographic areas where rural veterans are not currently served by national or existing state cemeteries." Theoretically, any town could be a potential location for a cemetery; therefore, the <i>number</i> of potential locations in which there are unserved rural veterans would equate to the number of towns in rural areas.
Finding: (Page 6, Paragraph 1)	"VA's strategic plan requires the establishment of goals that measure the level of performance to be achieved. Also, the Government Performance and Results Modernization Act of 2010, requires Federal agencies to establish performance goals expressed in an objective, quantifiable, and measurable form. In addition, the act requires a performance indicator be established to assess the progress of the goal."
VA Comments:	<p>Since the enactment of the Government Performance and Results Act of 1993 (GPRA), NCA has developed strategic plans that meet the criteria of this legislation and the Government Performance and Results Modernization Act of 2010 (GPRMA). One of NCA's most important strategic goals is to "ensure that the burial needs of veterans and their eligible family members are met." This goal includes a performance indicator that measures the percent of veterans served by a burial option within a reasonable (75-miles) distance of their residence. NCA sets annual goals for this measure as part of its annual budget request. NCA's strategic goal is to serve 96% of veterans within a reasonable distance of their residence.</p> <p>NCA accepts OIG's recommendation to establish performance goals for the percentage of rural and urban veterans served, within the previously established overall access goal of 96 percent, and will include these goals as part of NCA's strategy.</p>

<p>Finding: (Page 7, Paragraph 1)</p>	<p>"NCA cannot evaluate the level of service provided to veterans and their families residing in rural areas throughout the eight targeted states and the entire Nation. Without this specific veteran population information, NCA cannot adequately report to Congress and other stakeholders its performance on serving rural veterans."</p>
<p>VA Comments:</p>	<p>NCA concurs that it cannot adequately report to Congress and other stakeholders its performance on serving rural veterans <i>nationwide</i>. However, NCA has reported to Congress and other stakeholders on several occasions its progress on serving rural veterans in the eight states that are part of the Rural Initiative. NCA estimates that more than 133,000 veterans will be served by the eight National Veterans Burial Grounds, the first of which has been established in Laurel, Montana. These new facilities will increase the percent of veterans served by a burial option within a reasonable distance of their residency by approximately 0.62% of the total US veteran population.</p>
<p>Finding: (Page 10, Paragraph 1)</p>	<p>"We also determined NCA is expected to increase burial access for just over 13,500 unserved Idaho rural veterans after the completion of the NVBG in Twin Falls, ID. In addition, with the completion of the NVBG, Idaho is expected to have 22 counties just under 35,000 rural veterans remaining unserved."</p>
<p>VA Comments:</p>	<p>NCA originally identified Idaho Falls as the location for the NVBG in Idaho. NCA subsequently received an application for a new state veterans' cemetery in Idaho Falls. Accordingly, NCA moved the location for the Idaho NVBG to Twin Falls to maximize service coverage in Idaho. NCA estimates that 11 counties will fall within the service area of the new state cemetery in Idaho Falls.</p> <p>Using the figures provided in OIG's map (Page 10, Figure 2), NCA estimates that the new Idaho Falls state cemetery will provide service within a reasonable distance to approximately 21,385 Idaho veterans, reducing OIG's estimated number and percent of unserved Idaho veterans to 13,553 and 13%, respectively. NCA also calculates that the Idaho Falls state cemetery would reduce OIG's estimates of the number and percent of unserved veterans in the eight Rural Initiative states to 160,615 and 18%, respectively (Page 3, Table 2).</p>

Appendix E Office of Inspector General Contact and Staff Acknowledgments

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